UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. ERNEST D. CHAVEZ a/k/a "Lax," HUGH T. CAMPBELL a/k/a "Tim Templeton," CARTER G. FAWCETT a/k/a "Captain," [redacted] BRADY O. SHELLHAMMER a/k/a "Beglu" a/k/a "Bbbeglu," JIMMY WONG a/k/a "Yasser Lopez," KIMBERLY A. ANGLIN a/k/a "Kim Anglin," MARK M. SAMPIERI a/k/a "The Chef" a/k/a "SainT," VICTORIA S. HASKINS a/k/a "Cat Face" a/k/a "Sparkles Fancy Pants," VANCE H. BEADLES a/k/a "Mr. Green," MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex," and PATRICK C. NAYLOR a/k/a "YANTF" a/k/a "YANTF 2x," Defendants.	CASE NO. 1:25CR40 JUDGE J. HOPKINS INDICTMENT 18 U.S.C. § 371

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. Defendant **ERNEST D. CHAVEZ a/k/a "Lax"** was a resident of Arizona.
2. Defendant **HUGH T. CAMPBELL a/k/a "Tim Templeton"** was a resident of Pennsylvania.
3. Defendant **CARTER G. FAWCETT a/k/a "Captain"** was a resident of Colorado.
4. Defendant [redacted] was a resident of [redacted]
5. Defendant **BRADY O. SHELLHAMMER a/k/a "Beglu" a/k/a "Bbbeglu"** was a resident of Louisiana.
6. Defendant **JIMMY WONG a/k/a "Yasser Lopez"** was a resident of New York.
7. Defendant **KIMBERLY A. ANGLIN a/k/a "Kim Anglin"** was a resident of Connecticut.
8. Defendant **MARK M. SAMPIERI a/k/a "The Chef" a/k/a "SainT"** was a resident of Connecticut.
9. Defendant **VICTORIA S. HASKINS a/k/a "Cat Face" a/k/a "Sparkles Fancy Pants"** was a resident of Louisiana.
10. Defendant **VANCE H. BEADLES a/k/a "Mr. Green"** was a resident of Kentucky.
11. Defendant **MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex"** was a resident of North Carolina.
12. Defendant **PATRICK C. NAYLOR a/k/a "YANTF" a/k/a "YANTF 2x"** was a resident of North Carolina.
13. Nicholas T. Dryden a/k/a "Niko Bellic" was a resident of the Southern District of Ohio.
14. Giancarlo Morelli a/k/a "Lord Cmdr GC" was a resident of New Jersey.

COUNT 1
(CONSPIRACY TO CREATE AND DISTRIBUTE ANIMAL CRUSH VIDEOS)
(18 U.S.C. § 371)

15. Paragraphs 1 through 14 of the Indictment are incorporated herein.

16. Beginning on an unknown date but no later than on or about December 23, 2022, and continuing through at least on or about April 22, 2023, in the Southern District of Ohio and elsewhere, the defendants,

ERNEST D. CHAVEZ a/k/a "Lax,"
HUGH T. CAMPBELL a/k/a "Tim Templeton,"
CARTER G. FAWCETT a/k/a "Captain,"
[redacted],
BRADY O. SHELLHAMMER a/k/a "Beglu" a/k/a "Bbbeglu,"
JIMMY WONG a/k/a "Yasser Lopez,"
KIMBERLY A. ANGLIN a/k/a "Kim Anglin,"
MARK M. SAMPIERI a/k/a "The Chef" a/k/a "SainT,"
VICTORIA S. HASKINS a/k/a "Cat Face" a/k/a "Sparkles Fancy Pants,"
VANCE H. BEADLES a/k/a "Mr. Green,"
MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex," and
PATRICK C. NAYLOR a/k/a "YANTF" a/k/a "YANTF 2x,"

did unlawfully and knowingly combine, conspire, confederate, and agree with each other and with other persons whose identities are known and unknown to the Grand Jury, to commit the following objects of the conspiracy:

Objects of the Conspiracy

A. **Creation of Animal Crush Videos:** The conspirators agreed to create animal crush videos, as that term is defined in Title 18, United States Code, Section 48(f)(2), intending and having reason to know that the animal crush videos would be distributed in, or using a means or facility of, interstate or foreign commerce, in violation of Title 18, United States Code, Sections 48(a)(2) and 48(b).

B. Distribution of Animal Crush Videos: the conspirators agreed to sell, market, advertise, exchange, and distribute, animal crush videos using a means and facility of interstate and foreign commerce, in violation of Title 18, Unites States Code, Sections 48(a)(3) and 48(b).

Manner and Means

17. Among the manner and means employed by ERNEST D. CHAVEZ a/k/a "Lax," HUGH T. CAMPBELL a/k/a "Tim Templeton," CARTER G. FAWCETT a/k/a "Captain," [redacted] BRADY O. SHELLHAMMER a/k/a "Beglu" a/k/a "Bbbeglu," JIMMY WONG a/k/a "Yasser Lopez," KIMBERLY A. ANGLIN a/k/a "Kim Anglin," MARK M. SAMPIERI a/k/a "The Chef" a/k/a "SainT," VICTORIA S. HASKINS a/k/a "Cat Face" a/k/a "Sparkles Fancy Pants," VANCE H. BEADLES a/k/a "Mr. Green," MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex," PATRICK C. NAYLOR a/k/a "YANTF" a/k/a "YANTF 2x," Nicholas T. Dryden a/k/a "Niko Bellic," Giancarlo Morelli a/k/a "Lord Cmdr GC," and co-conspirators to carry out the conspiracy were:

a. To participate in private, online chat groups on messaging platforms such as Telegram, the purposes of which were to view, discuss, promote, advertise, exchange, market, purchase, sell, distribute, solicit, and fund animal crush videos depicting the torture, murder, sexually sadistic mutilation, and sexual abuse of animals, specifically baby and adult monkeys.

b. To send communications and funds electronically to Nicholas T. Dryden a/k/a "Niko Bellic" and others for the purpose of funding and causing the creation, advertisement, exchange, and distribution of animal crush videos. Nicholas T. Dryden a/k/a "Niko Bellic" and others would send communications and funds electronically to individuals

(known as "videographers" or "VOs") outside of the United States in exchange for the creation and distribution of animal crush videos.

c. To direct and encourage the sexually sadistic mutilation, sexual abuse, bestiality, torture, and murder of monkeys by the videographers in order to create animal crush videos which were electronically distributed to Nicholas T. Dryden, a/k/a "Niko Bellic" in the United States and others.

d. To use phone-based and/or online messaging programs and other electronic means to distribute and cause the distribution of the animal crush videos to and among the members of the conspiracy.

Overt Acts

In furtherance of the conspiracy, and to effect and accomplish its objectives, ERNEST D. CHAVEZ a/k/a "Lax," HUGH T. CAMPBELL a/k/a "Tim Templeton," CARTER G. FAWCETT a/k/a "Captain," [redacted] BRADY O. SHELLHAMMER a/k/a "Beglu" a/k/a "Bbbeglu," JIMMY WONG a/k/a "Yasser Lopez," KIMBERLY A. ANGLIN a/k/a "Kim Anglin," MARK M. SAMPIERI a/k/a "The Chef" a/k/a "SainT," VICTORIA S. HASKINS a/k/a "Cat Face" a/k/a "Sparkles Fancy Pants," VANCE H. BEADLES a/k/a "Mr. Green," MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex," PATRICK C. NAYLOR a/k/a "YANTF" a/k/a "YANTF 2x," Giancarlo Morelli a/k/a "Lord Cmdr GC," Nicholas T. Dryden, a/k/a "Niko Bellic," and other co-conspirators committed one or more of the following overt acts in the Southern District of Ohio and elsewhere:

Overt Act 1. Between on or about December 23, 2022, and March 26, 2023, ERNEST D. CHAVEZ a/k/a "Lax," [redacted] VICTORIA S. HASKINS a/k/a "Cat Face" a/k/a "Sparkles Fancy Pants," VANCE H. BEADLES a/k/a

"Mr. Green," and other co-conspirators (CCs) exchanged the following messages in the Telegram group *Dungeons and Monkeys* that also included HUGH T. CAMPBELL a/k/a "Tim Templeton," CARTER G. FAWCETT a/k/a "Captain," JIMMY WONG a/k/a "Yasser Lopez," Nicholas T. Dryden a/k/a "Niko Bellic," and others:

[redacted] …If you ever have a masturbating monkey (although any monkey will do), can you please start off the video by letting him play with himself just enough to get himself hard, and then rip his whole dick off? I don't mean just cut it off. I mean if you can just put on some latex gloves and literally pull it right off his body while he screams bloody murder. I want to do that to one of them so bad [redacted] Then he'll be sexually frustrated the whole time he's being tortured and die without cumming lel

…

CHAVEZ: Should've just pulled that dick and balls all the way off lol

…

CHAVEZ: He screamed pretty loud when he tugged on it. Who knows what would've tagged along when it came flying out

…

[redacted] I had this idea to cut open the monyet's ballbag then grab his balls and pull them right out

…

LAX: See that's what I imagine in that video after he pulls the foreskin off of it and gives it the plier circumcision

…

CC1: It would be great to cut off the rats [note: "rat" is slang for monkey] dick and put it in his ass then put a bit rouge on his face then spray a bit chanel no 5 on him and call him your bitch and slap him until he gets a black eye

CC2: The monkeys ballsack should also be removed in pulled strips like the living skin next to your nails

[redacted] Whatever he does to the individual monkeys, I love seeing duos and trios. Monyets pathetically clinging to each other while they get rekt

...

BEADLES: pav pav [note: "pav pav" is the name of a monkey] must be fed his severed schlong

...

CC3: Guys please I need your help. I mistakenly deleted the video of the hot nail in a rat's ass. Do they have it here? That video is when the rat is on a table near a small burner on where the VO is heating the nail. And the video ends with the VO slamming the rat against a wall! please someone help me

...

HASKINS: PavPavs Pub Attentions all you wonderful patrons! tonight starting at 7 central we will be having a contest! we are giving a prize to the person who can come up with the best torture method to PavPav! Bring your favorite adult beverage because we are also play a drinking game! it will be great fun!

Overt Act 2. On or about March 12, 2023, Videographer 1 (VO1), a minor living in Indonesia, distributed an animal crush video to Nicholas T. Dryden a/k/a "Niko Bellic." The video is approximately 22 minutes long. It depicts VO1 engaging in various acts with a baby monkey

to include sticking a spoon in the monkey's anus, dunking the monkey into a container of water with the spoon protruding from its anus, slamming it repeatedly into a cage by its tail, and ultimately killing the baby monkey.

Overt Act 3. Between on or about March 17, 2023, and April 22, 2023, co-conspirators exchanged the following messages in the Telegram group *B-A-N-A-N-A-S* that included MARK M. SAMPIERI a/k/a "The Chef" a/k/a "SainT," VANCE H. BEADLES a/k/a "Mr. Green," MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex," Giancarlo Morelli a/k/a "Lord Cmdr GC," Nicholas T. Dryden a/k/a "Niko Bellic," and others:

CC4: Anyone have the video of the monkey getting the stick up it's as and out it's eye or the eyeball needle one

CC5: I posted it here today!

..

CC5: As I notice, a few classics are missing here Do you know that with the hot nail in the ass?

..

CC6: Sew his asshole shut

CC6: And give it laxatives

CC7: I still say to fill it with expanding foam insulation.

CC6: Oh

CC6: That's easier

CC6: Sounds great

CC7: Maybe use a speculum to open its ass and then fill it with pink fiberglass insulation.

...

CC5: [After posting a video] "The hot nail video. I like the ending very much. He slams the piece of shit against the wall until it dies and throws it back into the jungle like garbage"

Overt Act 4. On or about March 22, 2023, VO1 distributed an animal crush video to Nicholas T. Dryden a/k/a "Niko Bellic." The video is approximately 16 minutes long. It depicts VO1 engaging in various acts with a baby monkey to include prying the baby monkey away from its mother, zooming in on the genitals of the baby, boiling the baby alive in a liquid, and returning the dead baby to the mother.

Overt Act 5. On or about March 24, 2023, VO1 distributed an animal crush video to Nicholas T. Dryden a/k/a "Niko Bellic." The video is approximately 23 minutes long. It depicts VO1 engaging in various acts with a baby monkey to include burning the genitals of the monkey.

Overt Act 6. On or about March 25, 2023, VO1 distributed an animal crush video to Nicholas T. Dryden a/k/a "Niko Bellic." The video is approximately 19 minutes long. It depicts VO1 engaging in various acts with a baby monkey to include sticking a wooden skewer in the monkey's anus, sticking fish hooks in the monkey's head, attaching the monkey to a cage using a fishhook protruding from its head, burning the monkey's face and head, cutting the monkey repeatedly in the mouth, head, and body with wire cutters, picking up the monkey by a wooden skewer protruding from its anus, and ultimately killing the baby monkey.

Overt Act 7. On or about March 26, 2023, JIMMY WONG a/k/a "Yasser Lopez" and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

Dryden: I got this 29min video and a 19 mins kill video for 50

WONG: I sent you 2 donations on go fund one for 12 and another for 28

WONG: Will send receipts

Overt Act 8. Between on or about April 4, 2023, and on or about April 20, 2023, [redacted] and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

[redacted]: How much will it be?

Dryden: I'll do 40 for you because you payed for the monkey

[redacted] Could we possibly do 30 just this time? I'm only asking because I'm already in overdraft again this month and I have $32 left on my wd limit until I get my next cheque. I'm gonna get an application handed in somewhere this week though so I can have more disposable income

Dryden: That's fine brother . I'm gonna do it for free

Dryden: Don't worry about it

Dryden: Send email

[redacted] That's dope. Thanks a lot man. I really appreciate it

[redacted]@[redacted]

...

[redacted] Also would it be possible at some point to see a video with sibling monkeys together or a mother and her baby? Like just rip the baby from her arms and then beat her upside the head with her own baby or something lmfao

[redacted] I'd probably want the baby to die first, but then completely disembowel it and take its brain out so that the mother knows it's dead. They possibly don't understand death, so it would be cool to see how she reacts to fully understanding

that her baby is fuckin gone, and then just keep the camera on her for a few minutes if she starts wailing and hooing before she dies

Overt Act 9. Between on or about April 4, 2023, and on or about April 9, 2023, MARY L. LONGORIA, a/k/a "R6," a/k/a "R6ex" and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

LONGORIA: I just sent $20. Just my way of saying thank you

…

Dryden: I feel like u should tell ppl the only way they can join is to send 10 videos from there collection within 20 minutes.

LONGORIA: True but I sure didn't when I started and I feel pretty real! I am only going to get it up to 35 max... The group that is.

LONGORIA: Just trying to give the new people a foot in the door

Overt Act 10. On or about April 7, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" and VO1 exchanged the following messages on WhatsApp:

Dryden: Bottom line, brother. Tell me if you could make the video tonight. Get an ordinary baby with a long tail and if you can, please try to make a good video tonight.

VO1: Oaky, I will try.

VO1: Now.

VO1: I asked the monkey seller to deliver the baby monkey now.

Dryden: Okay get the smallest and healthiest and when you get it, let me know. Please let me send a short video. Customers have been waiting for too long, we have to please them

Dryden: Okay bro. I'm going to send you some ideas. Let's make good money again.

Dryden: So, this is the best video that you have ever made. I don't care. Go ahead and kill it. I'll buy another one tomorrow.

Overt Act 11. On or about April 7, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following messages to VO1 on WhatsApp:

Dryden: Yes, I'm taking up your time easily, brother. Don't rush it. Don't rush it

…

Dryden: I'm…I'm happy, not angry with you, I have no complaints. You did an amazing thing, protect it.

…

Dryden: Bro, you're, you're a cool guy. Cool friend. We make more money by producing.

Overt Act 12. On or about April 8, 2023, VO1 distributed an animal crush video electronically to Nicholas T. Dryden a/k/a "Niko Bellic" in the Southern District of Ohio. The video is approximately 30 minutes long. It initially depicts a piece of paper with the words "Niko Bellic" written across it. The video then depicts various acts of torture being performed by VO1 upon a juvenile monkey, including burning the genitals and anus of the monkey.

Overt Act 13. Between on or about April 8, 2023, and on or about April 18, 2023, CARTER G. FAWCETT, a/k/a "Captain" and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

FAWCETT: Can you send it here and I'll delete it after joining?

Dryden: Yea

Dryden: Yea I forget which one it is I have to check

Dryden: That's the one where he rips it's Arm off

FAWCETT: Idk if I've seen it

Dryden: Where he cuts it's leg off with a razor

Dryden: Best video he ever made

FAWCETT: Haven't seen it. Can you send it?

...

FAWCETT: Lemme know if you can do $70 on the 100 min of content brotha. Just down on cash rn but will be back up soon. Bought the last 6 vids, I'll keep buying more too.

Dryden: Yea.i cak

Dryden: Can

Dryden: I can do 60

Dryden: You've been loyal

FAWCETT: Appreciate it

Overt Act 14. Between on or about April 9, 2023, and on or about April 20, 2023, HUGH T. CAMPBELL a/k/a "Tim Templeton" and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

Dryden: Okay . Please do not say anything or screenshot that video at all brother. They are already looking into this

CAMPBELL: That video was awesome. Nice and gruesome.

CAMPBELL: I won't do anything like that. I just like to watch. I don't have any desire to steal content or share and risk starting any trouble

…

Dryden: U can not share with anyone. Things are hot right now.

CAMPBELL: [after receiving a preview video] Oh yeah, I fucking want these.

…

CAMPBELL: Oh shit.nyour dude is wild.

CAMPBELL: Love it

…

CAMPBELL: Yo! Boy or girl rat?

…

Dryden: Boy

CAMPBELL: Fuck yea

CAMPBELL: How do you communicate with your guy?

CAMPBELL: I'm messaging a YouTuber from Indonesia who hunts monkeys

Overt Act 15. On or about April 9, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" and VO1 exchanged the following messages on WhatsApp:

Dryden: Can you get a very small, long tail [note: a type of monkey] today? The smallest one that you could find.

VO1: I'll find it for you today.

Dryden: And for some reason customers want you to put diapers on a monkey. I don't like this customer, but he pays well.

…

Dryden: Okay don't worry about the APE today. Only get a long tailed. This customer is asking you to put diapers on a baby monkey and get the smallest diapers you can find. This customer is the best.

Dryden: He pays the most. So, it will be good to do what he says. He also sent me some ideas too. Tell me the approximate time when the baby monkey will arrive and when the video is ready.

Overt Act 16. On or about April 10, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following message to VO1 on WhatsApp: "When making the video, make the other one watch the other monkey getting tortured."

Overt Act 17. On or about April 10, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" and VO1 exchanged the following messages on WhatsApp:

Dryden: Send me a photo of the second baby.

Dryden: He said he wants you to put diapers on it. I don't know why. But this is what he asked for

Dryden: He is weird.

Dryden: He kept asking me that.

Overt Act 18. On or about April 11, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" and Giancarlo Morelli a/k/a "Lord Cmdr GC," exchanged the following messages on WhatsApp:

Morelli: I just finished the first one. I gotta say, wasn't one of his best ones. He spent too much time with the diaper problem. He did beat the shit out of it tho. To only beat the shit out of them is good if they are a little older or if it's a pigtail [note: a type of monkey]. This way they fight back a little you know? I had an idea. You know how he's always getting females. You how everyone hates the damn mudflaps [note: "mudflap" is

a slang term for genitalia] they have? Why doesn't he cut open a mudflap in a video to see what's in there? Lol

...

Dryden: Yea ur right. And as the top person who contributes I will make that happen in the next video for you and I really appreciate the advice man. I geuss tonight is mudflap madness

Overt Act 19. On or about April 12, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following messages to VO1 on WhatsApp:

Dryden: Be creative with the next one. Pull his tongues as far as you can with pliers. Put his feet in boiling water, cut off his ears and set his head on fire with a lighter

...

Dryden: Dress him in yellow clothes and be nice to it first by feeding him with the bottle.

...

Dryden: Go ahead and surprise me. Be creative. I want to see how creative you are.

Overt Act 20. On or about April 13, 2023, VO1 distributed an animal crush video electronically to Nicholas T. Dryden a/k/a "Niko Bellic." The video is approximately 19 minutes long. It initially depicts a piece of paper sitting on a wire cage with the words "Niko Bellic" and "[redacted] is a Snitch" written across it. The video then depicts various acts of torture being performed by VO1 upon a baby monkey in a yellow wrapping, including burning the genitals and anus of the monkey.

Overt Act 21. On or about April 13, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following message to VO1 on WhatsApp: "Okay. Thank you, bro. Tomorrow. We buy another 2. Let's see how these videos work."

Overt Act 22. On or about April 13, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following message to VO1 on WhatsApp: "Okay I will send the money. In a few hours, get another baby monkey."

Overt Act 23. On or about April 13, 2023, ERNEST D. CHAVEZ a/k/a "Lax," Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages:

Dryden: Thanks bro. Let me see that new video too if u can

CHAVEZ: Alright but like you ask me please don't share it

…

CHAVEZ: Yessir this is me trusting you tho

…

CHAVEZ: [after sending a video to Dryden] Wild ass nigga huh?

…

Dryden: Aye u got any more rare shit I haven't seen?

…

CHAVEZ: Have you seen the other vids?

Dryden: Yea thenbloodunkne

Dryden: The bloody one

Dryden: And the one wit the different type monkey

CHAVEZ: There's one we're he cuts the face off

Dryden: Yea that was sick

CHAVEZ: One where he pulls the heart out

…

Dryden: [after CHAVEZ sends a video] Oh hell yeah.mynnigggaaaaaa

CHAVEZ: Lmao I'm so pissied

He didn't fuck up the one sucking it's own dick bro I hate monkeys that do that shit

CHAVEZ: Should've cut it off and then watch it try to suck it when it's missing

Overt Act 24. Between on or about April 14, 2023, and on or about April 18, 2023, VANCE H. BEADLES a/k/a "Mr. Green" and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

BEADLES: It's sad that as a community we'll never grow and develop with all the infighting. I don't know why they are giving you a hard time, right now you're all we got in way of new content. Idgaf what you do or how you do it, I just want to keep sauce [note: a slang term for monkey torture videos] flowing

…

BEADLES: Man my donors bailed, I'd like to get as much sauce as possible, I got $50, you have anyone to help with a donation?

Dryden: That will work go ahead a and send it do you have cash app

Overt Act 25. On or about April 14, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following messages to VO1 on WhatsApp:

Dryden: I want you to leave one of them without a leg and then let him crawl to the adult monkeys.

Dryden: And hold the other one, be very nice to him feed him and dress him in yellow clothes while the other monkey crawls without a leg. After cutting off his leg, burn the wound with a lighter.

Dryden: To burn the wounds and throw salt on it. Please include older monkeys in this video because it seems to attract most customers. Please do this thing that I mentioned.

Dryden: And add some of your own stuff into it. Make them lengthy like the last time.

Overt Act 26. Between on or about April 15, 2023, and April 22, 2023, BRADY O. SHELLHAMMER a/k/a "Beglu" a/k/a "Bbbeglu," and others exchanged the following messages in the Telegram group *Galleria Discussion* that also included MARK M. SAMPIERI a/k/a "The Chef" a/k/a "SainT," VANCE H. BEADLES a/k/a "Mr. Green," and MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex," Nicholas T. Dryden a/k/a "Niko Bellic," and others:

CC9: ive seen a video of a rat's dick being lit on fire and it was the absolute greatest thrill to witness

…

SHELLHAMMER: i can send whatever VO wants from the USA

…

Dryden: Everyone please go to the ideas section and leave some ideas

Overt Act 27. Between on or about April 16, 2023, and April 22, 2023, Nicholas T. Dryden a/k/a "Niko Bellic," Giancarlo Morelli a/k/a "Lord Cmdr GC," MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex," and others exchanged the following messages in the Telegram group

Famiglia Privata that also included ERNEST D. CHAVEZ a/k/a "Lax," HUGH T. CAMPBELL a/k/a "Tim Templeton," [redacted], JIMMY WONG a/k/a "Yasser Lopez," KIMBERLY A. ANGLIN a/k/a "Kim Anglin," VICTORIA S. HASKINS a/k/a "Cat Face" a/k/a "Sparkles Fancy Pants," VANCE H. BEADLES a/k/a "Mr. Green," and PATRICK C. NAYLOR a/k/a "YANTF" a/k/a "YANTF 2x," and others:

Dryden: Brb ysl I'm bout to edit this vid

Morelli: anyone have any rarely before seen sauce to pass the time till Niko gets this ready

…

CC10: @NB932 idea for video. Find male monyet with a huge mudflap and have the VO cut it off.

Dryden: He did in the most recent one

Dryden: Well half way

Dryden: Had to turn my head on that

Dryden: Fuck it I'ma leak it

CC10: Most generous!

…

Dryden: Lol u ain't lien I'm bout to share some videos

LONGORIA: Well don't leave me out of you do 😂

CC11: Too simple and easy. Have more fun with it. Staple that mudflap to the bottom lip of another one

...

CC10: Staple monyet mudflap to forehead of its mother

...

CC12: I want to see a stump tail get its boner razored off

...

CC12: Theres a video link on Karenmafia twitter's page that leads to 6 vids. And one of em is fish hooks its old but they pierce its sack and dick hang it by fishoooks and line

Overt Act 28. On or about April 16, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following messages to VO1 on WhatsApp:

Dryden: Could make the video right now?

Dryden: I've sent You all the ideas and things to do

Dryden: And write on paper, "Niko Loves You Guys"

Dryden: Let me know if you can do it now

Dryden: It would be an amazing brother if you could.

Overt Act 29. On or about April 16, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following message to VO1 on WhatsApp: "If you can make a video in the next 2 hours, I will give you 40 dollars extra."

Overt Act 30. On or about April 16, 2023, VO1 distributed an animal crush video electronically to Nicholas T. Dryden a/k/a "Niko Bellic." The video is approximately 30 minutes long. It initially depicts a piece of paper with the words "Niko Bellic Loves You Guys" written across it. The video then depicts various acts of torture being performed by VO1 upon a monkey, including burning the genitals and anus of the monkey.

Overt Act 31. On or about April 17, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following messages to VO1 on WhatsApp:

Dryden: Here are some other suggestions. Choke it to almost dead (pinching the throat), bees or ants in jars, put super glue in the hands, buttocks or mouth, stretch its arms and legs with a ratchet until it is broken

Dryden: Tie him to the cage and force him to eat shit. Then put out the cigarette. If you have a snake, let the snake attack him first, then in his eyes. Then force him into a small jar with cap and fill it with water until he almost drowns

Dryden: If you have a snake, let the snake attack him first and beat him up a little bit but don't knock him out. The tie him to the cage and put a cigarette in his eyes and forced him to eat

Dryden: Then after that force him into the small jar and cover it. Fill it with water until he almost drowns and then after that see if he wants to eat bananas

Dryden: then break every bone in his leg with pliers that you have and throw him back with the snake and brutally beat it to death.

Overt Act 32. On or about April 17, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" sent the following message to VO1 on WhatsApp: "This customer is asking you to do all the things that he asked for, He paid us repeatedly. I told him that you would do it for him."

Overt Act 33. On or about April 18, 2023, VO1 distributed an animal crush video electronically to Dryden. The video is approximately 31 minutes long. It initially depicts a piece of paper with the words "Niko Bellic Telegram @NB932" written across it. The video then depicts various acts of torture being performed by VO1 upon a monkey, including putting superglue into the anus of a monkey.

Overt Act 34. On or about April 18, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" posted the following message to the Telegram group *Famiglia Privata*: "Okay I'm bout to send you previews of the latest video. One of the best he's ever done By far." Dryden then posted a screenshot from a video showing a monkey with its legs bound with tape, eyes closed and mouth open, held by the neck. A paper with the words "Niko Bellic Telegram @NB932" is visible underneath the monkey.

Overt Act 35. On or about April 18, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" posted multiple short "teaser" videos to the Telegram group *Famiglia Privata*. In one, a 13 second video, the videographer is seen holding a baby male monkey. The monkey is brought closer to the camera for a close-up shot of the monkey's genitals. The watermark "@NB932" is visible across the screen.

Overt Act 36. On or about April 18, 2023, KIMBERLY A. ANGLIN a/k/a "Kim Anglin" and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

ANGLIN: Yea want that one the one sucking on his weiner

ANGLIN: How much

Overt Act 37. On or about April 18, 2023, PATRICK C. NAYLOR a/k/a "YANTF" a/k/a "YANTF 2x," and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

Dryden: I got 42 minute for you for 70

NAYLOR: Okay let me see what all I gotta right now . Hold on

Dryden: U can't leak this yet Please. I don't mind doing business as long as you wait at least 3 days or 4 before leaking that's why I ain't been hitting u up fr

…

Dryden: I'll do 60

NAYLOR: Yes I don't see why you listen to them lame asses bro . I've bought a video from you remember ? And it's never been leaked

Overt Act 38. On or about April 19, 2023, Nicholas T. Dryden a/k/a "Niko Bellic" and VO1 exchanged the following messages on WhatsApp:

VO1: What idea that you will give?

VO1: To make it now.

Dryden: Okay kill the smaller one first.

Dryden: Make Mom and Dad watch

Dryden: Tie it to a cage, break all four limbs with pliers.

VO1: Okay.

…

Dryden: Wait a minute, I'll send some more.

Dryden: What sort of tools do you have?

Dryden: Do you have a blender?

…

Dryden: Do this again with the little one but do this without any mercy

Dryden: Also, don't forget to dress it in yellow clothes

Dryden: Burn his ass with matches and burn his hands and feet in boiling water

Dryden: Then let him crawl around to see if he will go to his parents.

...

Dryden: The customer wants you to kill it by slamming his face to the ground with its feet at the end.

Dryden: One other thing. Let the teenage monkey live. But break his arm if you can. And you can put it back into the cage but make sure you let him watch the torture.

Dryden: And let them go to each other from time to time, then separate them.

Overt Act 39. On or about April 20, 2023, VO1 distributed a video electronically to Nicholas T. Dryden a/k/a "Niko Bellic." The video is approximately 33 minutes long. The video then depicts various acts of torture being performed by VO1 upon a monkey, including burning the genitals and anus of the monkey repeatedly and cutting the genitals of a male monkey with scissors.

Overt Act 40. On or about April 21, 2023, BRADY O. SHELLHAMMER a/k/a "Beglu," a/k/a "Bbbeglu" and Nicholas T. Dryden a/k/a "Niko Bellic" exchanged the following messages on Telegram:

SHELLHAMMER: can i have the video of the big brother and his little bro watching themselves getting castrated? they were outside and there was a lot of lip smacking. thats the video that i sent 20$ for. it was in Planet Monpai, but for some reason it doesn't let me watch it.

SHELLHAMMER: And i want to see more of 2 brothers that aren't fetuses, watching themselves being disciplined. If you got one like that and there is lip smacking i will send more $

Overt Act 41. – Overt Act 79. On or about the dates listed below, defendants ERNEST D. CHAVEZ a/k/a "Lax," HUGH T. CAMPBELL a/k/a "Tim Templeton," CARTER G. FAWCETT a/k/a "Captain," [redacted] BRADY O. SHELLHAMMER a/k/a "Beglu," a/k/a "Bbbeglu," JIMMY WONG a/k/a "Yasser Lopez," KIMBERLY A. ANGLIN a/k/a "Kim Anglin," MARK M. SAMPIERI a/k/a "The Chef" a/k/a "SainT," VICTORIA S. HASKINS a/k/a "Cat Face" a/k/a "Sparkles Fancy Pants," VANCE H. BEADLES a/k/a "Mr. Green," MARY L. LONGORIA a/k/a "R6" a/k/a "R6ex," and PATRICK C. NAYLOR a/k/a "YANTF" a/k/a "YANTF 2x," used CashApp, GoFundMe, and Mighty Cause to send payment to Nicholas T. Dryden in the Southern District of Ohio for the purpose of funding and causing the creation and distribution of monkey torture videos:

Paid by: ERNEST D. CHAVEZ a/k/a "Lax"	**Cashtag/Display Name: [redacted] El Señor Lax**		
	Date	**Payment Type**	**Amount**
Overt Act 41	3/15/2023	CashApp	$45
Overt Act 42	3/16/2023	CashApp	$20
Overt Act 43	3/23/2023	CashApp	$40
Overt Act 44	3/25/2023	CashApp	$40
Overt Act 45	3/29/2023	CashApp	$40
Overt Act 46	4/3/2023	CashApp	$40
Paid by: HUGH T. CAMPBELL a/k/a "Tim Templeton"	**Cashtag/Display Name: [redacted] Tcamp**		
	Date	**Payment Type**	**Amount**
Overt Act 47	4/6/2023	CashApp	$50
Overt Act 48	4/9/2023	CashApp	$35
Overt Act 49	4/13/2023	CashApp	$100
Overt Act 50	4/19/2023	CashApp	$220

Paid by: **CARTER G. FAWCETT** **a/k/a "Captain"**	**Cashtag/Display Name:** [redacted] **Carter F**		
	Date	**Payment Type**	**Amount**
Overt Act 51	4/2/2023	CashApp	$60
Overt Act 52	4/3/2023	CashApp	$60
Overt Act 53	4/14/2023	CashApp	$80
Overt Act 54	4/22/2023	CashApp	$60
[redacted]	[redacted]		
	Date	**Payment Type**	**Amount**
Overt Act 55	3/25/2023	GoFundMe	$15
Overt Act 56	3/25/2023	GoFundMe	$35
Overt Act 57	3/31/2023	GoFundMe	$175
Overt Act 58	4/22/2023	Mighty Cause	$70
Overt Act 59	4/22/2023	Mighty Cause	$70
Paid by: **BRADY O. SHELLHAMMER** **a/k/a "Beglu"** **a/k/a "Bbbeglu"**	**Cashtag/Display Name:** [redacted] **Ydarb Hammer**		
	Date	**Payment Type**	**Amount**
Overt Act 60	4/20/2023	CashApp	$20
Paid by: **JIMMY WONG** **a/k/a "Yasser Lopez"**	**Cashtag/Display Name:** [redacted] **Jimmy Wong** **GoFundMe Name: Jimmy Wong**		
	Date	**Payment Type**	**Amount**
Overt Act 61	3/24/2023	GoFundMe	$20
Overt Act 62	3/26/2023	GoFundMe	$28
Overt Act 63	4/14/2023	CashApp	$35
Overt Act 64	4/14/2023	CashApp	$35 (expired)
Paid by: **KIMBERLY A. ANGLIN** **a/k/a "Kim Anglin"**	**Cashtag/Display Name:** [redacted] **Kimberly A Anglin**		
	Date	**Payment Type**	**Amount**
Overt Act 65	4/18/2023	CashApp	$100
Overt Act 66	4/19/2023	CashApp	$75

Paid by: **MARK M. SAMPIERI** **a/k/a "The Chef"** **a/k/a "SainT"**	**Cashtag/Display Name:** [redacted]**The Chef**		
	Date	**Payment Type**	**Amount**
Overt Act 67	3/13/2023	CashApp	$70
Overt Act 68	3/23/2023	CashApp	$70 (declined)
Overt Act 69	3/25/2023	CashApp	$45
Overt Act 70	3/25/2023	CashApp	$25
Paid by: **VICTORIA S. HASKINS** **a/k/a "Cat Face"** **a/k/a "Sparkles Fancy Pants"**	**Cashtag/Display Name:** [redacted]**Victoria Haskins**		
	Date	**Payment Type**	**Amount**
Overt Act 71	3/3/2023	CashApp	$25
Overt Act 72	3/7/2023	CashApp	$25
Paid by: **VANCE H. BEADLES** **a/k/a "Mr. Green"**	**Cashtag/Display Name:** [redacted]**Calvin Green**		
	Date	**Payment Type**	**Amount**
Overt Act 73	4/19/2023	CashApp	$50
Paid by: **MARY L. LONGORIA** **a/k/a "R6"** **a/k/a "R6ex"**	**Cashtag/Display Name:** [redacted]**mary**		
	Date	**Payment Type**	**Amount**
Overt Act 74	3/27/2023	CashApp	$20
Overt Act 75	4/4/2023	CashApp	$20
Overt Act 76	4/10/2023	CashApp	$50
Paid by: **PATRICK C. NAYLOR** **a/k/a "YANTF"** **a/k/a "YANTF 2X"**	**Cashtag/Display Name:** [redacted]**P .R .E PAT**		
	Date	**Payment Type**	**Amount**
Overt Act 77	3/27/2023	CashApp	$40
Overt Act 78	4/18/2023	CashApp	$30
Overt Act 79	4/18/2023	CashApp	$30

All in violation of 18 U.S.C. §371.

A TRUE BILL:

/S/

GRAND JURY FOREPERSON

KELLY A. NORRIS
ACTING UNITED STATES ATTORNEY

ADAM R.F. GUSTAFSON
ACTING ASSISTANT ATTORNEY GENERAL

ADAM C. CULLMAN (KY #93912)
Special Assistant United States Attorney &
Sr. Trial Attorney, Environmental Crimes Section
Environment and Natural Resources Division
221 E. 4th St. Ste. 400
Cincinnati, OH 45202
adam.cullman@usdoj.gov

Timothy D. Oakley
Assistant United States Attorney
221 E. 4th St. Ste. 400
Cincinnati, OH 45202